

1 ROBERT T. EGLET, ESQ.
2 Nevada Bar No. 3402
3 TRACY A. EGLET, ESQ.
4 Nevada Bar No. 6419
5 BRITTNEY R. GLOVER, ESQ.
6 Nevada Bar No. 15412
EGLET ADAMS EGLET
HAM HENRIOD
7 400 South 7th Street, #400
8 Las Vegas, Nevada 89101
Tel.: 702-450-5400
Fax: 702-450-5451
eservice@egletlaw.com

9 CHAD M. GOLIGHTLY, ESQ.
10 Nevada Bar No. 5331
11 **LAW OFFICES OF**
CHAD M. GOLIGHTLY, LTD
12 8560 S. Eastern Ave., Ste. 240
13 Las Vegas, NV 89123
14 *Attorneys for Plaintiff*

ROBERT T. EGLET, ESQ.
Nevada Bar No. 3402
TRACY A. EGLET, ESQ.
Nevada Bar No. 6419
ROBERT M. ADAMS, ESQ.
Nevada Bar No. 6551
ARTEMUS W. HAM, IV, ESQ.
Nevada Bar No. 7001
JOEL D. HENRIOD, ESQ.
Nevada Bar No 8492
CHAD M. GOLIGHTLY, ESQ.
Nevada Bar No. 5331
EGLET ADAMS & GOLIGHTLY, PLLC
400 South 7th Street, 4th Floor
Las Vegas, Nevada 89101

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 MANICHANH SITIVONG,
17 Plaintiff,
18 vs.
19 UNITED STATE OF AMERICA,
20 Defendant.

CASE NO.: 2:22-CV-00169-APG-DJA

STIPULATION AND ORDER TO
EXTEND TIME TO FILE THE JOINT
PRE-TRIAL ORDER (First Request)

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EGLET ADAMS
EGLET HAM HENRIOD

1 Plaintiff, MANICHANH SITIVONG, and Defendant, UNITED STATES OF AMERICA,
2 by and through their counsel of record, hereby submit the following Stipulation to Extend Time
3 to File the Joint Pre-trial Order by an additional 30 days.

4 Pursuant to this Court's August 5, 2024, Order (ECF No. 81), the parties are required to
5 submit a Joint Pre-Trial Order within 30 days after this Court rendered its decision on Plaintiff's
6 Motion for Partial Summary Judgment Regarding Damages Cap. On September 5, 2024, this
7 Court issued its Order Denying Plaintiff's Motion for Partial Summary, without prejudice. (ECF
8 No. 81). Accordingly, the Joint Pre-Trial Order is due on or before October 7, 2024.

9 The parties submit this stipulation to extend time to file the Joint Pre-Trial Order because
10 Plaintiff's trial and lead attorneys, Robert and Tracy Eglet, along with Jordan Eglet, who is also
11 an attorney on this case, left the country on September 8, 2024 to attend Jordan's wedding and
12 they will be unavailable until the end of September. As such, Plaintiff's trial and lead attorneys
13 are not available to make factual, legal, and evidentiary decisions and provide pertinent input
14 necessary to complete the Joint Pre-Trial Order in preparation for trial in this matter. Accordingly,
15 the parties need additional time to draft, review, exchange, and complete the proposed Joint Pre-
16 Trial Order.

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1 In light of these circumstances, with this Court's permission, the parties have agreed to
2 extend the deadline to file the Joint Pre-Trial Order by 30 days, from October 7, 2024 to November
3, 2024.

4
5 DATED this 11th day of September, 2024.

6 /s/ Brittney R. Glover
7 ROBERT T. EGLET, ESQ.
Nevada Bar No. 3402
8 TRACY A. EGLET, ESQ.
Nevada Bar No. 6419
9 BRITTNEY R. GLOVER, ESQ.
Nevada Bar No. 15412
10 **EGLET ADAMS EGLET**
HAM HENRIOD
11 400 South Seventh Street, Suite 400
Las Vegas, Nevada 89101
12 *Attorneys for Plaintiff*

DATED this 11th day of September, 2024.

13 /s/ R. Thomas Colonna
14 JASON M. FRIERSON, ESQ.
United States Attorney
District of Nevada
Nevada Bar No. 7709
15 R. THOMAS COLONNA, ESQ.
Assistant United States Attorney
16 *Attorneys for the United States*

17 IT IS SO ORDERED

18 
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: 9/12/2024

21 **EGLET ADAMS**
22 **EGLET HAM HENRIOD**

Bianca Marx

From: Colonna, Richard (USANV) <Richard.Colonna@usdoj.gov>
Sent: Wednesday, September 11, 2024 12:47 PM
To: Brittney Glover; Bivens, Cortney (USANV); Minkova, Vera (USANV)
Cc: Joel D. Henriod; Bianca Marx
Subject: Re: Sitivong -- JPTO

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Brittney, this looks fine. You can e sign for me and file. Thanks.

V/r,
Tom

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From: Brittney Glover <bglover@egletlaw.com>
Sent: Wednesday, September 11, 2024 3:42:16 PM
To: Colonna, Richard (USANV) <RColonna@usa.doj.gov>; Bivens, Cortney (USANV) <CBivens@usa.doj.gov>; Minkova, Vera (USANV) <VMinkova@usa.doj.gov>
Cc: Joel D. Henriod <jhenriod@egletlaw.com>; Bianca Marx <bmarx@egletlaw.com>
Subject: [EXTERNAL] RE: Sitivong -- JPTO

Hi Tom,

The proposed SAO attached. If signed, the new deadline will be November 6, 2024. Please note that my firm will be out of the country for our firm retreat from November 6 – 11, so I'd like to file the JPO by 11/5, at the latest.

Let me know if we have permission to affix your e-signature.

Thank you.